

I. INTRODUCTION

This Agenda is designed to assist EPA New England in the development of a revised and expanded Regional Lead Strategy.

This Agenda was prepared by Katie Mazer following a September 23, 1999 Lead Strategy Development Taskforce meeting attended by EPA New England and New England Lead Coordinating Committee (NELCC) State and Community partners. The Taskforce developed a shared vision, and identified those activities which have proved to be most successful, illuminated barriers to success, and suggested targeted efforts to move the EPA New England Regional Lead Strategy forward efficiently and effectively.

The Agenda is not a workplan and it does not make actual commitments on behalf of EPA New England. Instead, it suggests specific items which could be incorporated into a goal oriented strategic and revised workplan that would include activities, time-lines and responsibilities.

Explanation of italics, and structure of this document. Pertinent notes were taken directly from Naomi Mermin's NELCC Taskforce facilitation notes. The notes explain the Taskforce rationale for goals, objectives and action items. Specific suggestions and requests appear in italics in Parts I, II and III. Part IV. Is a listing of suggested activities EPA could conduct in direct response to the suggestions and requests of the Taskforce.

This Agenda presents a major goal: *"Eliminate medically confirmed blood lead levels greater than 10 ug/dL among children under age 6 in New England by 2010"*, using three broad strategic objectives.

- Building Infrastructure
- Increasing Effectiveness of Outreach and Education
- Increasing Compliance and Enforcement

II. GOAL

"Eliminate medically confirmed blood lead levels greater than 10 ug/dL among children under age 6 in New England by 2010".

To meet this goal, the Region suggests an interim target goal: "Eliminate blood lead levels greater than or equal to 15 ug/dL in New England Children by the year 2005". This interim target goal will help us measure our progress and if necessary re-calibrate our efforts.

We will be able to measure the success of our goal when we have gathered 1990 baseline data and analyzed the trends in States and Targeted Communities, including total numbers of children tested, and the numbers of children testing above 15 ug/dL and 10 ug/dL.

"The Region I NELCC strategy group conducted considerable discussion in the development of this goal. In setting a high goal, using the word "eliminating" in an unmodified form, we recognized that full attainment is an extraordinary challenge. However, we agreed that we would rather set the higher goal and find we came 99% of the way to full attainment than be satisfied with 80% or 90% because we had a more compromised goal. The inclusion of a targeted blood lead level of 10ug/dL is specific, measurable and avoids the term "lead poisoning" which is defined differently across New England. It is consistent with the CDC Healthy People goal and with the weight of evidence that at this level we do see negative impacts for children. We are including the language about measurement in recognition that as lead levels come down and the number of children effected decrease, screening rates may decrease creating an artificial reflection of success, or conversely invigorating efforts at targeted screening may artificially make it appear rates are increasing. We therefore would like to measure our success against true prevalence data.

From the existing screening data it was possible to conclude that lead poisoning rates (children with blood levels at or greater than 10ug/dL) across the region are at about 4% of children under six. The rate increases as you look at economically disadvantaged children, although there are also a substantial number of lead poisoned children who may not be economically disadvantaged who live in homes which have recently been renovated (approximately a third of cases)."

In order for the Lead Agenda to be successful, there must be a focus on Environmental Justice. "This focus would recognize that lead poisoning falls into a category of health and environmental issues in which certain populations are more at risk and suffer disproportionately from lead poisoning. We emphasize this for the attainment of our goal to ensure that as we judge our strategies and measure our success this element is in the forefront of our thinking and actions".

prevention".

III. STRATEGIC OBJECTIVES

1. BUILDING INFRASTRUCTURE

A. Data Gathering

Data gathering is a cornerstone of the Proposed Agenda and will enable us to more effectively target our efforts and measure our success.

- Data will be compiled reflecting the incidence, location and prevalence of lead poisoning, 1990 to the present.
- Data will be compiled on lead abatement and lead safe renovation activities.
- Data will be compiled on funding sources and expenditures, including current dollar amount, if available, of investment in lead poisoning prevention activities by CDC, HUD, EPA New England, States, Municipalities, private organizations (including charitable organizations and businesses in the form of Community Reinvestment), Bureau of Indian Affairs, Department of Agriculture and any additional in-kind contributions of material or manpower.

"An outline of these lead poison prevention funded activities should be developed and should include a break-out of figures for infrastructure of programs versus intervention funds, such as funds for education, housing improvement and services such as environmental investigation and case management."

B. Funding Issues

"In some cases funding may drop to levels that impact basic infrastructure. EPA New England can assist by working with HUD and CDC to help them recognize that inconsistent funding and continued fracturing of funding undercuts basic infrastructure and is ultimately more costly as organizations spend time competing for limited funds and developing "new" programs while the solid existing lead infrastructure withers."

i. State Grant Programs Support

Staffing in state agencies needs to be maintained. *"State Grant Funding helps maintain the current State Staff of lead poisoning prevention workers who represent the basic infrastructure for lead poisoning prevention, TSCA implementation, and support for other non-profit organizations"*.

ii. Development of Existing Federal & Private Funding

An emphasis will be placed on development of existing Federal funding as well as community financial and private sector insurance institutions to more effectively leverage resources for home interventions. Funding information will be included on the EPA New England Lead web site, and distributed to state local and community partners as it becomes available.

"Current grant funding for health outreach workers is unsustainable and does not recognize the core function these health outreach workers play in

C. Additional Partnerships and Support

EPA will support NELCC and CONEST, participate in Federal Partnerships as we continue to foster regional collaboration and reciprocity, and encourage partnership among all stakeholders including community groups.

2. INCREASE EFFECTIVENESS OF OUTREACH AND EDUCATION

A. Educational Models

"EPA New England should provide financial support to only those education activities which use the more effective "health belief" models designed to change people's beliefs and move them to adopt different values".

B. Distribution and Promotion of EPA New England Resources and Materials

"EPA is able to develop and produce materials and tools more efficiently through TSCA partnership. In particular the "Parent Guide", the "Renovation Guide", the "Keep It Clean" materials, "First Steps" daycare manual, video and CD."

C. Development of Cost Effective & Safe Abatements and Interventions

"Research and transmission of "best" models is insufficient. What are the most cost effective and safe interventions? The science and policy has not been put together as guidance for states rather states and advocates are left to judge all the individual pieces of research and develop independent models".

3. INCREASE COMPLIANCE/ENFORCEMENT

A. Development of a Regional Enforcement Strategy

"A key barrier to reaching our ambitious goal is lack of EPA New England follow up and enforcement of the disclosure rule and pre-renovation rule which creates an atmosphere of distrust with the regulated parties and undercuts state and local staff who have done outreach on the rules for EPA New England". "Staff at EPA New England should respond to calls with assistance not simply refer back to states."

B. Support for State Enforcement Programs

EPA will continue to provide technical support and funding for State and Tribal Programs for Section 402, Lead-based Paint Activities Training and Certification Rules.

C. EPA New England Supplemental Environmental Program (SEP) SEP program allows for projects to be submitted to the SEP Bank for possible implementation of lead poison prevention projects through settlements of EPA enforcement actions

IV. POTENTIAL ACTIVITIES

1. BUILDING INFRASTRUCTURE

A. Data Gathering

Data Gathering, a cornerstone of the Agenda, will provide the data to design more integrated outreach and enforcement activities.

i. Establishment of Targets for Data Gathering

Targeted localities and vulnerable populations with high blood lead levels will be identified to facilitate selection of areas in which to target and measure our ability to reduce blood lead levels of disadvantaged children.

ii. Resource Expenditure Data

Federal, State, Local and Community resource expenditures in States, Tribal Lands, and targeted communities, will be collected and compiled in dollars and in-kind services.

iii. Data on Medicaid and Insurance Resources

Listings of medicaid coverage for blood lead testing, and insurance coverage, will be developed, made available on the Web Site, and used in direct outreach efforts to the medical community.

iv. EPA New England Lead Web Site

The web site will contain a regional information bank including EPA New England resource information, and summary reports of Lead Poison Prevention activities.

B. Funding

i. Federal Support - TSCA

Continue EPA support of State, Tribal, City and community programs and insure the stability of these programs through: Grants, Consortiums and technical assistance, especially through in TSCA State Grant Funds, to provide continued support of staff positions for State Programs.

ii. Non-TSCA Federal and Private Grants

Award and distribution of Non-TSCA Federal and private grant funding. Federal Agencies will actively seek to award and distribute such funding, and provide information on relevant grant solicitations when available. Examples include:

- EPA "EMPACT" Grant
- UEI - Urban Environmental Initiative Grant
- EE - Environmental Education Grants
- EJ - Environmental Justice Grants
- HUD Grants
- CDC Grants

C. Additional Partnering and Support

i. EPA New England Support of NELCC & CONEST

These consortia continue to foster regional collaboration and reciprocity, disseminate best practices, facilitate efficient sharing of resources and expertise, and provide education and outreach to the regulated community.

ii. Expansion of Federal Partnership Initiatives

Expansion of Federal Partnerships to focus on Federal Initiatives such as "The HUD Healthy Homes Initiative", and "The Presidents Task Force on Environmental Health Risks and Safety Risks to Children". Federal Partnerships include:

- US Department of Housing and Urban Development (HUD)
- US Department of Health and Human Services, CDC
- Agency For Toxic Substances and Disease Registry
- NIOSH National Institute for Occupational Safety and Health
- FWS National Fish and Wildlife Service
- DOJ Department of Justice
- BIA Bureau of Indian Affairs

iii. Support for Community Activities

Federal Agencies will provide support for community activities such as, but not limited to:

- URP - Urban Resources Partnership
- CLHAC - Connecticut Lead Hazard Awareness Coalition
- HHS -HUD funded "Healthy Homes Initiative" across the Region
- Providence Mayor's Safe Housing Lead Task Force
- Providence Vacant Lots Program
- Providence Lead Action Project
- Greater Boston Lead Action Collaborative
- Tribal Based Environmental Protection programs
- Hartford Lead Safe House
- Providence Lead Safe House
- Lead Safe Houses throughout the Region
- Boston Lead Action Coalition
- Day care staff parent and child education
- Environmental Justice projects involving local issues and disadvantaged people.
- "Train the Trainer" programs such as the Manchester NH "The Way Home H.A.V.E. Healthy Homes" initiative

2. INCREASE EFFECTIVENESS OF OUTREACH/EDUCATION

A. Use of Health Belief Model

Insure the efficacy of Education/Outreach through: proper targeting of technical and non-technical educational outreach according to partners and audience; and by implementing a Regional Health Education Strategy, providing outreach and tools. These shall be based on the "Health Belief" education model.

The Health Belief Model states that individuals are likely to take actions to address health issues if:

- They are susceptible to the condition.
- They believe the condition has serious health consequences.
- They believe the condition can reduce their stability or their ability to succeed.
- Barriers and costs don't outweigh the benefits.

i. Target Parents, Schools, Day Care Providers

Provide information on lead poison prevention and blood lead testing, including:

- "Healthy Homes" focus including web site links to community "Healthy Homes" activities and resources including

- Development of a packet of existing Healthy Homes handout materials to be available for consumer inquiries and to be distributed at health fairs. The Healthy Homes packet will include health effects, risk management, and resources, as well as information on the following:

- Asthma
- Lead in paint, soil, and water
- Radon in air and water
- Indoor air quality issues
- Household hazardous waste
- Household and lawn/garden pesticides

ii. Target Medical Infrastructure

To best target the medical infrastructure, partnerships will be developed to augment outreach activities and to share outreach tools and funding sources targeted toward identified community needs.

• Medicaid Eligible Blood Lead Testing

Although the blood lead testing rates in the Region are higher than the national average, they need to improve.

GAO recently completed an investigation and found that despite CDC recommendations and Medicaid requirements, lead screening rates are extremely low for Medicaid eligible children:

"National Survey indicates that only 19% of children aged 1-5 covered by Medicaid had received a blood lead screening test, 65% of children with elevated blood lead levels enrolled in Medicaid are never identified and never receive proper treatment."

- CDC Guidelines Followed During Lead Screening

A Federal workplan will be established to insure that CDC lead screening occurs with Medicaid eligible children.

• Education Directed to Physicians & Other Medical Practitioners About Lead Poisoning Health Effects

Education will be directed to members of the Medical Infrastructure, including Health Outreach Workers, HMO's, Community Health Centers, and other Medical Care Providers,

about lead poisoning health effects, prevention, and how to understand and recognize the environmental health connection to childhood lead poisoning, particularly the connection between housing, health, and other "healthy homes" issues.

• Access to Information.

Physicians and other health care providers will be provided with access to referral resources that will support their patients (i.e. for environmental inspection and follow up) -and information to conduct BLL testing according to the CDC protocol.

iii. Target Renovators, Realtors and Rental Property Owners.

• Assist With the Development of Standardized Training Components or Modules of Training for House Painters and Renovators

EPA and NELCC, with Partners, will facilitate sharing of information between individuals and states and will work toward the goal of educating the majority of contractors and renovators to adopt lead safe practices.

• Educate Contractors and Renovators About TSCA 406 Pre-Renovation Notification Rule, and TSCA 403 Identification of Lead Based Paint Hazards Rule

This will be conducted through direct outreach and access to the EPA New England web site or guidance on TSCA 406 Lead Safe Renovation Rule; and TSCA 403 Health Based Lead Hazard and Renovation Clearance Standards. EPA NELCC and Partners will also distribute information on healthy homes; lead safe renovation; low cost interventions; and state lead hazard and clearance levels when they are more restrictive than the EPA hazard levels.

B. Distribution and Promotion of EPA New England Tools and Materials

i. EPA New England Resources

EPA contact resource names and access routes, instructions on how to access EPA meeting space, EPA Laboratory testing resources testing services, and available technical presentations by EPA staff will be made available via the EPA New England Lead Web site.

ii. EPA tools.

EPA New England will actively promote and distribute the following resources and tools to make them available and useful to the widest possible audience:

- **English as a Second Language** "Healthy Beginnings: Lead Safe Families"

- **Tools for Renovation and Remodelers**

- "Lead Safe Renovator Training Manual" An 8 hour worker and 16 hour supervisor lead safe renovator course using interactive CD Rom technology.
- "IMPACT" Interactive Module For Lead Awareness Course. A 6 hour self study course designed for educating vocational technical high school/college students including interactive CD Rom technology
- **Day Care Provider/Parent**
 - Day care provider/parent lead awareness manual "First Steps"
 - 3 volume set. English "What You Should Know About Lead Poisoning: A Manual for Child Care Providers"
 - Spanish "Lo que debe saber acerca de la intoxicación por plomo"
 - Native American version "Little Moccasins, A Lead Poisoning Prevention Manual for Tribal Day Providers and Families". Video, "Little Moccasins"
- **Interactive CD Rom**
 - "First Steps:" "Little Moccasins" includes video clips of lessons, materials, games and the entire three volume First Steps program. (Due 3/00)
 - "Lead Suite Steps", State Tribal Enhanced Pb System, containing CDC, HUD, EPA New England, regulations, guidance, educational manuals, fact sheets, software, presentations. (Version I 7/99) (Version II 6/00)
 - "Lead Safe Renovator", Quick Reference tool for the Remodelers, renovator, painter, that will impact lead paint. Includes video clips, regulations, guidance documents (Due 6/00)
 - "Impact" - Interactive Module For Lead Awareness Course Technology for vocational technical high schools and colleges. Self-paced learning module with video clips of lessons, pre and final testing
 - "TRENDS - Time Related Environmental Numeric Health Data Systems". Correlates environmental sampling points with health data points on a GIS platform (Due 12-00)
- **Web Site Development**
 - "CERT - Certified Environmental Registry Tracking System." Tracks New England lead licensed individuals and firms, education and citation history
 - "Lead Net - Lead Education Authorized Directory of New England Trainers". Contains a listing of New England approved and audited lead training providers (Due 3/00)
 - "EPA New England Lead Web Site" to be developed in 2000.

- NELCC Web site - developed to assist NELCC members. Also will include information on "Keep it Clean, lead-safe renovation" and links to other relevant sites.

iii. Disposal of Lead in Soil and Architectural Debris Disposal

- Through Project XL, which stands for excellence in leadership, EPA helped Lead Safe Cambridge dispose of soils contaminated with Lead in Municipal Solid Waste Landfills.
- Similarly, Project XL is helping the City of Boston dispose of its architectural debris in a more cost effective manner.
- Distribution of "Lead Safe Yard" materials developed by "EMPACT grant" and "Lead in Soils Design Charette"

C. Development of a Catalogue and Hierarchy of Cost Effective Abatement and Safe Intervention Techniques

This will be compiled by EPA New England, HUD, and other federal agencies and the Abatement Industry and added to the EPA New England web site. A list of state approved lead-safe renovators/lead abatement professionals will also be included in the EPA New England Lead Web site.

3. INCREASE COMPLIANCE/ ENFORCEMENT

A. Development of an Enforcement Strategy:

EPA-New England, Office of Environmental Stewardship, will coordinate with Federal Partners, State officials, Indian Tribes, and communities, as appropriate, to identify program activities and resources, and the best unified approach for enforcement and compliance in New England, including:

- TSCA Section 402, Lead-based Paint Activities Training and Certification Rule
- TSCA Section 406, Pre-Renovation Notification Rule
- Section 1018, Real Estate Notification and Disclosure Rule

The Strategy will include:

i. Tips and Complaints. EPA New England will follow-up on tips and complaints from the public regarding non-compliance with any of the lead rules identified above. Follow-up may include a telephone call, an information request letter, subpoena, an inspection, or other action, as appropriate. Higher priority will be given to tips and complaints involving target housing (pre 1978 housing) where a pregnant woman or a child is an occupant. EPA will maintain a Lead Hotline and welcome Tips and Complaints.

ii. Targeted-Federal Inspections. Efforts will be made to coordinate with the appropriate agencies to obtain data such as elevated blood levels (EBLs) and the environmental sampling results of lead inspections which show the presence of lead-based paint. This data can then be used to factor in to the Region's targeting approach so that limited resources are

focused on the highest risks of childhood lead poisoning. Inspection priority will be given to child-occupied facilities with reported EBLs, built prior to 1978, in neighborhoods that are disproportionately impacted. Priorities will be on 1018 and 406 inspections in non delegated states.

iii. Enforcement Responses. Enforcement responses may include Notices of Noncompliance, administrative penalty actions, civil judicial actions, criminal actions, or any combination of these. The Region may obtain injunctive relief by referring matters to the U.S. Department of Justice. Regional enforcement actions will be publicized to promote compliance.

B. Support of State Enforcement Programs

Approved State and Tribal Programs for Section 402, Lead-based Paint Activities Training and Certification Rules will be supported by EPA with financial and technical assistance. EPA-New England will also provide additional enforcement response if they are requested by these agencies.

C. EPA New England Supplemental Environmental Projects

Target State, City and Community Partners for submission of project ideas to the EPA New England Supplemental Environmental Projects Bank. State and Community partners will develop a number of locally defined "lead abatement, lead poison prevention or healthy homes" projects to be submitted to the SEP Bank for possible implementation through settlements of EPA enforcement actions.